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Plaintiffs Samsung Electronics Co., Ltd.
and Samsung Electronics America, Inc.

Listing of counsel continued on page 2.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

LARGAN PRECISION CO., LTD.,

**Plaintiff and Counterclaim
Defendant,**

v.

**SAMSUNG ELECTRONICS CO.,
LTD., et al.,**

**Defendants and Counterclaim
Plaintiffs.**

Case No. 13-CV-2740 DMS (NLS)

**SAMSUNG'S NOTICE OF MOTION
AND SUMMARY JUDGMENT AND
DAUBERT MOTIONS**

JURY TRIAL DEMANDED

Judge: Hon. Dana M. Sabraw
Date: October 23, 2015
Time: 1:30 p.m.
Courtroom: 13A

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17 and Samsung Electronics America, Inc.
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that at the above-captioned time and date or as soon thereafter as the matter may be heard in Courtroom 13A of the above-entitled Court, located at 333 West Broadway, San Diego, California, 92101, Defendants/Counterclaimants will and hereby do move this Court for summary judgment on: (1) non-infringement of the '860, '190, '191, and '807 patents; (2) anticipation/obviousness of the '602 patent; (3) lack of written description for all patents-in-suit; (4) no pre-suit damages due to lack of marking; (5) the '691 patent does not block Samsung's non-infringing alternatives; and (6) no willfulness. Summary judgment is appropriate; Largan has not, and cannot, raise a genuine issue of material fact on these issues and Samsung is entitled to judgment as a matter of law.

Samsung will further move to exclude the following opinions of Largan experts Dr. Julie Bentley, Mr. Brian Napper, and Mr. Philip Johnson: (1) Dr. Bentley's and Mr. Napper's reverse engineering and patent benefit opinions, (2) Dr. Bentley's and Mr. Napper's alleged embodying product-based opinions, and (3) Mr. Johnson's and Mr. Napper's survey and opinions based thereon. The instant motion is based upon the Memorandum of Points and Authorities in Support of Samsung's Summary Judgment and *Daubert* Motions, the Civil Local Rules and Patent Local Rules of the United States District Court for the Southern District of California, the files and records in this action, and any and all other materials submitted to the Court on or before the time of its decision in this matter.

1 DATED: September 3, 2015

Respectfully submitted,

2 /s/ David W. Higer

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